

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL INC.)	
and HONEYWELL INTELLECTUAL)	
PROPERTIES INC.,)	
)	
Plaintiffs,)	
)	C.A. No. 04-1338-***
v.)	C.A. No. 04-1337-***
)	C.A. No. 04-1536-***
APPLE COMPUTER, INC., et al.)	(Consolidated)
)	
Defendants.)	

**NOTICE OF DEPOSITION
OF PLAINTIFFS HONEYWELL INTERNATIONAL INC. AND HONEYWELL
INTELLECTUAL PROPERTIES INC. PURSUANT TO FED. R. CIV. P. 30(b)(6)**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and pursuant to Delaware Local Rules 30.1 through 30.6, Defendants Optrex America, Inc., FUJIFILM Corporation, FUJIFILM U.S.A., Inc., Samsung SDI Co., Ltd., Samsung SDI America, Inc., Wintek Corporation, Wintek Electro-Optics Corporation, Citizen Displays Co. Ltd., and Citizen Watch Co. Ltd. will take the deposition upon oral examination of plaintiffs Honeywell International Inc. ("HII") and Honeywell Intellectual Properties Inc. ("HIPI"), and specifically the witness or witnesses designated by HII and HIPI as officers, managing agents, directors, agents, employees or other person(s) who are most knowledgeable and can testify on their behalf with respect to each of the categories identified in Appendix A hereto, commencing at 9:00 a.m. on September 21, 2007 before a notary public or other officer duly authorized to administer oaths at the Hyatt Regency Phoenix, 122 North Second Street, Phoenix, Arizona, USA 85004, or such other location as mutually agreed upon by counsel. The deposition will also be videotaped.

PLEASE TAKE FURTHER NOTICE that HII and HIPI are requested to identify, on or before September 5, 2007, their designated witnesses and the matters to which each will testify.

You are invited to attend and cross-examine.

DATED: August 23, 2007

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale

Karen L. Pascale (#2903) [kpascale@ycst.com]
Karen E. Keller (#4489) [kkeller@ycst.com]
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600

- and -

Richard D. Kelly
Andrew M. Ollis
Alexander E. Gasser
John F. Presper
OBLON, SPIVAK, MCCLELLAND,
MAIER & NEUSTADT, P.C.
1940 Duke Street
Alexandria, VA 22314
(703) 413-3000
Attorneys for Optrex America, Inc.

POTTER, ANDERSON & CORROON

/s/ Philip A. Rovner

Philip A. Rovner (#3215)
[provner@potteranderson.com]
6th Floor, Hercules Plaza
1313 N. Market Street
Wilmington, DE 19801

- and -

STROOCK & STROOCK & LAVAN LLP

Lawrence Rosenthal

Matthew W. Siegal

Ian G. DiBernardo

Kevin C. Ecker

Angie M. Hankins

180 Maiden Lane

New York, NY 10038

(212) 806-5400

*Attorneys for FUJIFILM Corporation and
FUJIFILM U.S.A. Inc.*

POTTER, ANDERSON & CORROON

/s/ Richard L. Horwitz

Richard L. Horwitz (#2246)

[rhorwitz@potteranderson.com]

David E. Moore (#3983)

[dmoore@potteranderson.com]

6th Floor, Hercules Plaza

1313 N. Market Street

P.O. Box. 951

Wilmington, DE 19801

- and -

PAUL HASTINGS JANOFSKY & WALKER LLP

Stephen S. Korniczky

Elizabeth L. Brann

3579 Valley Centre Drive

San Diego, CA 92130

(858) 720-2500

Hamilton Loeb

875 15th Street, N.W.

Washington, D.C. 20005

(202) 551-1700

*Attorneys for Samsung SDI Co., Ltd. and
Samsung SDI America, Inc.*

POTTER, ANDERSON & CORROON

/s/ Richard L. Horwitz

Richard L. Horwitz (#2246)
[rhorwitz@potteranderson.com]
David E. Moore (#3983)
[dmoore@potteranderson.com]
6th Floor, Hercules Plaza
1313 N. Market Street
P.O. Box. 951
Wilmington, DE 19801

- and -

FINNEGAN, HENDERSON, FARABOW
GARRETT & DUNNER LLP

John R. Alison
E. Robert Yoches
Elizabeth A. Niemeyer
901 New York Ave, N.W.
Washington, D.C. 20001
(202) 408-4000

York M. Faulkner
11955 Freedom Drive
Reston, VA 20190
(571) 203-2700

*Attorneys for Wintek Corporation and
Wintek Electro-Optics Corporation*

BOUCHARD MARGULES & FRIEDLANDER, P.A.

/s/ John M. Seaman

David J. Margules (#2254)
[dmargules@bmf-law.com]
John M. Seaman (#3868)
[jseaman@bmf-law.com]
222 Delaware Avenue, Suite 1400
Wilmington, DE 19801

- and -

HOGAN & HARTSON LLP
Stuart Lubitz
David Ben-Meir
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
(310) 785-4600

*Attorneys for Citizen Watch Co. Ltd. and
Citizen Displays Co. Ltd.*

APPENDIX A

Definitions

A. “HII” shall mean plaintiff Honeywell International Inc., and all divisions, departments, subsidiaries (whether direct or indirect), parents, affiliates, acquisitions, predecessors and entities controlled by any of them, whether domestic or foreign, including but not limited to, Allied Corporation, Bendix Corp., Honeywell Inc., Allied-Signal, and/or AlliedSignal and their respective present or former officers, directors, employees, owners, attorneys and agents, as well as consultants and any other persons acting or purporting to act on behalf of each such entity or person.

B. “HIPI” shall mean plaintiff Honeywell Intellectual Properties Inc., and all divisions, departments, subsidiaries (whether direct or indirect), parents, affiliates, acquisitions, predecessors and entities controlled by any of them, whether domestic or foreign, including but not limited to, Allied Corporation, Bendix Corp., Honeywell Inc., Allied-Signal, and/or AlliedSignal and their respective present or former officers, directors, employees, owners, attorneys and agents, as well as consultants and any other persons acting or purporting to act on behalf of each such entity or person.

C. “Plaintiffs” shall mean HII and HIPI both individually and collectively.

D. “Defendant,” individually, or “Defendants,” collectively, shall mean one or more of the following entities: AU Optronics Corp.; AU Optronics Corporation America; All Around Co. Ltd.; Apple Computer Inc.; Argus; Arima Display; BOE Technology Group Company Ltd.; BOE-Hydis Technology Co. Ltd.; Beijing BOE Optoelectronics Technology Co. Ltd.; Casio Computer Co., LTD; Casio Inc.; Citizen Displays Co. Ltd; Citizen Systems America Corporation;

Citizen Systems America Corporation; Citizen Systems Europe; Citizen Watch Co. Ltd.; Concord Cameras; Dell Inc.; Eastman Kodak Co.; Eastman Kodak Co.; FUJIFILM Corporation; FUJIFILM U.S.A., Inc.; Fujitsu America Inc.; Fujitsu Computer Products of America Inc.; Fujitsu Limited; Hannstar Display Corporation; Hitachi Display Devices, Ltd.; Hitachi Displays Ltd.; Hitachi Electronic Devices (USA) Inc.; Hitachi Ltd.; Innolux Display Corporation; International Display Technology; International Display Technology USA Inc.; Koninklijke Philips Electronics N.V.; Kyocera Wireless Corp.; Kyocera Wireless Corp.; M-Display Optronics Corp.; Matsushita Electrical Corporation of America; Matsushita Electrical Corporation of America; Matsushita Electrical Industrial Co.; Navman NZ Limited; Navman U.S.A. Inc.; Olympus America Inc.; Olympus Corporation; Optrex America Inc.; Pentax Corporation; Pentax U.S.A. Inc.; Philips Consumer Electronics North America; Philips Electronics North America Corporation; Philips Electronics North America Corporation; Philips Electronics North America Corporation; Philips Electronics North America Corporation; Picvue Electronics Limited; Quanta Display Inc.; ST Liquid Crystal Display Corp.; Samsung SDI America Inc.; Samsung SDI Co. Ltd.; Seiko Epson Corporation; Seiko Epson Corporation; Sony Corp of America; Sony Corp of America; Sony Corporation; Sony Corporation; Sony Ericsson Mobile Communications (USA) Inc.; Sony Ericsson Mobile Communications AB; Toppoly Optoelectronics Corp.; Toshiba America Inc.; Toshiba Corporation; Wintek Corp.; Wintek Electro-Optics Corporation; Wintek Electro-Optics Corporation; and Wistron Corporation.

E. “Noticing Defendants” shall mean Optrex America Inc.; FUJIFILM Corporation; FUJIFILM U.S.A., Inc.; Samsung SDI Co. Ltd.; Samsung SDI America Inc.; Wintek Corporation; Wintek Electro-Optics Corporation; Citizen Displays Co. Ltd.; and Citizen Watch Co. Ltd.; individually and collectively.

- F. “LCD” shall mean liquid crystal display.
- G. “’371 patent” shall mean U.S. Pat. No. 5,280,371.
- H. “LCD Module” shall mean an LCD including a liquid crystal panel and other components for incorporation into another product to provide a viewable image to a user.
- I. “LCD Products” shall mean an LCD Module and/or a product incorporating an LCD Module, where such product is one of laptop computers, cellular phones, PDAs, digital still cameras, video cameras, portable DVD players, and portable televisions, and/or portable game systems, and all similar products.

Topics

1. The commercial relationship between plaintiffs and each Noticing Defendant from 1994-2003.
2. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants’ alleged infringement of the ‘371 patent relating to the effect of selling the subject matter claimed by the ‘371 patent in promoting plaintiffs’ sales of other products not covered by the ‘371 patent, and the extent of such derivative or “convoyed” sales.
3. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants’ alleged infringement of the ‘371 patent relating to the established profitability of the subject matter claimed by the ‘371 patent, its commercial success, and its current popularity.
4. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants’ alleged infringement of the ‘371 patent relating to the utility and advantages

of the subject matter claimed by the '371 patent over any old modes or devices that had been used including, but not limited to, any alleged utility or advantages over the structures shown in U.S. Patent No. 5,161,041 (Abileah) Fig. 6; U.S. Patent No. 4,298,249 (Gloor) Fig. 2; and IBM Technical Disclosure Bulletin, "High Efficiency Back Light for LCD," Feb. 1991.

5. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants' alleged infringement of the '371 patent relating to the utility and advantages of the subject matter claimed by the '371 patent over the structures disclosed but not claimed in the '371 patent having one lens array rotated slightly (i.e., '371 patent Fig. 12 and/or originally filed claim 9 from application no. 07/911,547).
6. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants' alleged infringement of the '371 patent relating to the nature of the subject matter claimed by the '371 patent, its character in the commercial embodiments owned and produced by Noticing Defendants, and the benefits to those who use or have used it.
7. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants' alleged infringement of the '371 patent relating to the extent to which Noticing Defendants used the subject matter claimed by the '371 patent and any evidence of the value of that use.
8. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants' alleged infringement of the '371 patent relating to the portion of the profit or selling price that is customary to allow for use of the subject matter claimed in '371 patent or analogous patents.

9. All facts plaintiffs contend are relevant to proving damages resulting from Noticing Defendants' alleged infringement of the '371 patent relating to the portion of the realizable profit from Noticing Defendants' sales of LCD Modules and/or LCD Products credited to the subject matter claimed by the '371 patent as distinguished from any non-patented elements, manufacturing processes, business risks or significant features or improvements added by Noticing Defendants.
10. All facts plaintiffs contend are relevant to determining the amount that plaintiffs and Noticing Defendants would have agreed upon, at the time Honeywell alleges that Noticing Defendants first began to infringe the '371 patent, if Honeywell and Noticing Defendants had reasonably and voluntarily tried to reach an agreement to license the '371 patent.
11. All facts plaintiffs contend are relevant to supporting or rebutting the royalty rate(s) plaintiffs purport to be entitled to from Noticing Defendants under the '371 patent.
12. All facts related to: the number of units of each accused product that plaintiffs allege are imported or contend on information and belief are imported into the United States; the number of units of each accused product that plaintiffs allege are sold worldwide and/or contend on information and belief are sold worldwide; identification of all countries worldwide in which units of each accused product are sold and the number of such units that plaintiffs allege are sold or contend on information and belief are sold in each such country; and the worldwide net sales of each such accused product and the relative percentage of sales of each such accused product that plaintiffs allege are imported and/or

contend on information and belief are imported into the United States, and the bases for such relative percentage.

13. Any license agreements to which Honeywell is a party, or that are known to Honeywell, referring or relating to the '371 patent, LCD display technology, or lighting systems, devices, or processes used to illuminate LCD panels, and documents relating or referring thereto.
14. All facts related to the alleged share of the United States market held by any accused LCD Module, any Defendant, or any customer of any Defendant.

CERTIFICATE OF SERVICE

I, Karen L. Pascale, hereby certify that on August 23, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

John R. Alison	john.alison@finnegan.com
Parker H. Bagley	pbagley@milbank.com
Robert J. Benson	rjbenson@hhlaw.com
Elizabeth L. Brann	elizabethbrann@paulhastings.com
Christopher E. Chalsen	cchalsen@milbank.com
Hua Chen	huachen@paulhastings.com
Arthur G. Connolly, III	aconnollyIII@cblh.com, dkt@cblh.com; telwell@cblh.com
Frederick L. Cottrell, III	cottrell@rlf.com
Francis DiGiovanni	fdigiovanni@cblh.com, dkt@cblh.com, ljarrell@cblh.com, rlitterst@cblh.com
Kevin C. Ecker	kecker@stroock.com
Amy Elizabeth Evans	aevans@crosslaw.com
York M. Faulkner	york.faulkner@finnegan.com
Christopher J. Gaspar	cgaspar@milbank.com
Alexander E. Gasser	agasser@oblon.com
Maria Granovsky	mgranovsky@mnat.com
Alan M. Grimaldi	grimaldia@howrey.com
Thomas C. Grimm	tcgefiling@mnat.com
Thomas Lee Halkowski	halkowski@fr.com, dob@fr.com, jrm@fr.com, kxk@fr.com, sub@fr.com
Angie Hankins	ahankins@stroock.com
Richard L. Horwitz	rhowitz@potteranderson.com, iplitigation@potteranderson.com, iplitigation2@potteranderson.com, mbaker@potteranderson.com, nmcmenamin@potteranderson.com
John T. Johnson	jjohnson@fr.com, lperez@fr.com; autuoro@fr.com
Robert J. Katzenstein	rjk@skfdelaware.com, eys@skfdelaware.com
Nelson M. Kee	keen@howrey.com
Richard D. Kelly	rkelly@oblon.com
Stephen S. Korniczky	stephenkorniczky@paulhastings.com
Hamilton Loeb	hamiltonloeb@paulhastings.com
Robert L. Maier	Robert.Maier@BakerBotts.com

David J. Margules	dmargules@BMF-law.com, lheritage@bmf-law.com
David Ellis Moore	dmoore@potteranderson.com, ntarantino@potteranderson.com
Carolyn E. Morris	carolynmorris@paulhastings.com
Arthur I. Neustadt	aneustadt@oblon.com
Matt Neiderman	mneiderman@duanemorris.com
Elizabeth A. Niemeyer	elizabeth.niemeyer@finnegan.com
Andrew M. Ollis	aollis@oblon.com
Adam Wyatt Poff	apoff@ycst.com, corporate@ycst.com; corpcal@ycst.com
Leslie A. Polizoti	lpolizoti@mnat.com
John F. Presper	jpresper@oblon.com
Alana A. Prills	alanaprills@paulhastings.com
Steven J Rizzi	steven.rizzi@weil.com
Lawrence Rosenthal	lrosenthal@stroock.com
Avelyn M. Ross	aross@velaw.com
Philip A. Rovner	provner@potteranderson.com, iplitigation@potteranderson.com, mstackel@potteranderson.com, mcmenamin@potteranderson.com
Robert C. Scheinfeld	robert.scheinfeld@bakerbotts.com
Carl E. Schlier	cschlier@oblon.com
John M. Seaman	jseaman@bmf-law.com, jfielder@bmf-law.com
Chad Michael Shandler	shandler@rlf.com, pstewart@rlf.com
John W. Shaw	jshaw@ycst.com, corporate@ycst.com; ptorterotot@ycst.com; corpcal@ycst.com
Matthew W. Siegal	msiegal@stroock.com
Neil P. Sirota	neil.sirota@bakerbotts.com
Monte Terrell Squire	msquire@ycst.com, corpcal@ycst.com, corporate@ycst.com
Roderick B. Williams	rickwilliams@velaw.com, smendoza@velaw.com
Edward R. Yoches	bob.yoches@finnegan.com
Steven J. Balick	sbalick@ashby-geddes.com, dfioravanti@ashby-geddes.com, dharker@ashby-geddes.com, jday@ashby-geddes.com, lmauire@ashby-geddes.com, mkippp@ashby-geddes.com, nlopez@ashby-geddes.com, tlydon@ashby-geddes.com
William F. Taylor, Jr.	wtaylor@mccarter.com
John G. Day	jday@ashby-geddes.com, dfioravanti@ashby-geddes.com, dharker@ashby-geddes.com, lmauire@ashby-geddes.com, mkippp@ashby-geddes.com, nlopez@ashby-geddes.com, sbalick@ashby-geddes.com, tlydon@ashby-geddes.com

Barry M. Graham	barry.graham@finnegan.com
Darren M. Jiron	darren.jiron@finnegan.com
William J. Marsden, Jr.	marsden@fr.com, dob@fr.com, kilby@fr.com, manis@fr.com, sub@fr.com

I further certify that on August 23, 2007, I caused a copy of the foregoing document to be served upon the following counsel of record as indicated below:

By Hand Delivery and E-Mail

Thomas C. Grimm [tgrimm@mnat.com]
Leslie A. Polizoti [lpolizoti@mnat.com]
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street
Wilmington, DE 19899-1347
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

Steven J. Balick [sbalick@ashby-geddes.com]
John G. Day [jday@ashby-geddes.com]
ASHBY & GEDDES
500 Delaware Avenue
P.O. Box 1150
Wilmington, DE 19899
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

By E-Mail

Martin R. Lueck [MRLueck@rkmc.com]
Matthew L. Woods [MLWoods@rkmc.com]
Jacob S. Zimmerman [JSZimmerman@rkmc.com]
Marta M. Chou [MMChou@rkmc.com]
Stacie E. Oberts, Esquire [SEOoberts@rkmc.com]
ROBINS, KAPLAN, MILLER & CIRESI LLP
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

Alan E. McKenna [AEMckenna@rkmc.com]
Anthony A. Froio [AAFroio@rkmc.com]
ROBINS, KAPLAN, MILLER & CIRESI LLP
111 Huntington Avenue, Suite 1300
Boston, MA 02199-7610
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

Philip A. Rovner [provner@potteranderson.com]
POTTER, ANDERSON & CORROON
6th Floor, Hercules Plaza
1313 N. Market Street
Wilmington, DE 19801
Attorneys for FUJIFILM Corporation and FUJIFILM U.S.A. Inc.

Richard L. Horwitz [rhorwitz@potteranderson.com]
David E. Moore [dmoore@potteranderson.com]
POTTER ANDERSON & CORROON
6th Floor, Hercules Plaza
1313 N. Market Street
P.O. Box. 951
Wilmington, DE 19801
Attorneys for Hitachi Displays, Ltd., Samsung SDI America, Inc., Samsung SDI Co., Ltd., Wintek Corp., and Wintek Electro-Optics Corporation

Matt Neiderman [MNeiderman@duanemorris]
DUANE MORRIS LLP
1100 North Market Street, Suite 1200
Wilmington, DE 19801-1246
Attorneys for InnoLux Display Corporation

David J. Margules [dmargules@bmf-law.com]
John M. Seaman [jseaman@bmf-law.com]
BOUCHARD MARGULES & FRIEDLANDER, P.A.
222 Delaware Avenue, Suite 1400
Wilmington, DE 19801
Attorneys for Citizen Watch Co., Ltd., and Citizen Displays Co., Ltd.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale

August 23, 2007

Karen L. Pascale (#2903) [kpascale@ycst.com]
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600
Attorneys for Optrex America, Inc.